

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

FLOR DE MARIA CACHO-BONILLA,  
EXECUTIVE DIRECTOR OF ASPRI;  
DR. WALDEMAR PEREZ-QUINTANA,  
ASSOCIATED DIRECTOR OF ASPRI.

Defendants.

CIVIL NO. 97-2133(CCC)

**MOTION REQUESTING ORDER TO SHOW CAUSE**

TO THE HONORABLE CARMEN CONSUELO CEREZO  
UNITED STATES DISTRICT JUDGE

ACCIÓN SOCIAL DE PUERTO RICO, INC. (ASPRI) through the undersigned attorney respectfully alleges and prays as follows:

1. On December 11, 2004 an order was issued by this Court granting to the United States of America a final term of fifteen (15) days after notice of the order to secure payment from the Health and Human Services of the monies owed to ASPRI. A copy of said order is attached hereto for the Court's ready reference.
2. The monies owed to ASPRI amount to \$11,316.80 in attorney fees and \$1,557.93 in cost and expenses.
3. Notwithstanding the aforestated until this date, the United States of America has failed to comply with the order of the Court, although the order was notified on December 15,

2003. Thus forcing the herein appearing party to incur in additional expenses as a result of the United States obstinacy.

WHEREFORE, it is respectfully requested that an order to show cause be issued against the United States of America as to why it should not be held in contempt and be condemned to pay interests and additional attorney fees.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of March, 2004.

I hereby certify that, on the same date that this motion was filed with the Court's Electronic Case Filing System, all parties not registered to receive electronic notification through this system were served with a true and exact copy of the motion by first class mail, postage prepaid, at their addresses of record.

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/s/ Rubén T. Nigaglioni  
USDC-PR 119901